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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

MARY J. SOTO,

Plaintiff,

v.

TRANS UNION LLC,

Defendant.

Case No. 2:21-cv-01389-JAD-EJY

**JOINT STIPULATION AND ORDER
EXTENDING DISCOVERY DEADLINES
(FIRST REQUEST)**

Plaintiff, and Defendant Trans Union LLC (“Trans Union”) (“the Parties”) hereby jointly move to extend all deadlines set forth in the Stipulated Discovery Plan and Scheduling Order filed with this Court on September 28, 2021, (Dkt. 11) by a period of sixty (60) days.

1. On July 26, 2021, Plaintiff filed her Complaint (Dkt. 1), against Defendant Trans Union LLC (“Trans Union”).

3. Defendant Trans Union filed its Answer to Plaintiff’s Complaint on September 17, 2021 (Dkt. 9).

4. The Parties require more time and accompanying deadlines from the Court. The parties are discussing settlement. Absent settlement, the parties intend to take depositions of one another and third parties.

7. Moreover, the requested extensions are not sought for the purposes of delay.

8. Accordingly, the parties request adoption of the following deadlines:

a. Discovery Plan:

Discovery Cut-off 04/19/2022

Deadline to Provide Expert Disclosures **2/18/2022**Deadline to Disclose Rebuttal Expert Disclosures **3/19/2022**

Deadline to File Dispositive Motions **05/17/2022**

b. Pre-Trial Order: The parties shall file a joint pretrial order no later than **6/17/2022** or thirty (30) days after the date set for filing dispositive motions. In the event that parties file dispositive motions, the date for filing the joint pretrial order shall be suspended until thirty (30) days after decision on the dispositive motion or further order of the Court.

WHEREFORE, Plaintiff and Trans Union respectfully requests this Honorable Court (1) extend discovery in the present matter as set forth above; and (2) reissue a new Scheduling Order to reflect the requested extension.

DATED: December 9, 2021

**QUILLING, SELANDER, LOWNDS,
WINSLETT & MOSER, P.C.**

LAW OFFICES OF MITCHELL GLINER

/s/ Jennifer Bergh

/s/ Mitchell D. Gliner

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IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated this 9th day of December 2021.